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FILED IN THE
U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

Jun 15, 2022

SEAN F. McAVOY, CLERK

6 UNITED STATES DISTRICT COURT,
7 EASTERN DISTRICT OF WASHINGTON

8 Plaintiff(s):

9 RANDALL S. AMES

10 v.

11 Defendant(s):

12 STANLEY ROY AMES, individually and
13 in his marital community and as agent
14 for AMES DEVELOPMENT CORP.,

15 WESLEY BRUCE AMES, individually
16 and in his marital community (if
17 applicable),

18 Merita Lynn Dysart, individually and in
her marital community

Allen C. Nielson, individually and in his
official capacity

Timothy Fennessey, individually and in
his official capacity

Case no.: 2:22-cv-00143-TOR

COMPLAINT FOR DAMAGES ARISING
FROM VIOLATIONS OF 42 U.S.C. §1983
and 18 U.S.C. §1962

19 Come now Plaintiff, and by way of Complaint against Defendants alleges as follows:

20 I. PARTIES

21 1. Plaintiff is domiciled in Idaho.

22 2. Defendant Stanley Roy Ames is believed to be domiciled in Oregon.

3. Defendant Wesley Bruce Ames is believed to be domiciled in Washington.
4. Defendant Merita Lynn Dysart is believed to be domiciled in California.
5. Defendant Allen C. Nielson is believed to be domiciled in Washington.
6. Defendant Timothy Fennessey is believed to be domiciled in Washington.
7. The State of Washington, Stevens County Washington, the Stevens County Washington Sheriff's Department and individual Sheriff Deputies, several Superior Court Judges in Stevens County Washington Superior Court, several Superior Court Judges in Spokane County Superior Court, were joint actors with the Defendants named above in regard to the acts and omissions listed below.

II. JURISDICTION AND VENUE

8. Jurisdiction is appropriate in this Court under 28 U.S.C. §1331(b).
9. Plaintiffs seek recovery under 42 U.S.C. §1983 and 18 U.S.C. §1962, and thus original federal subject matter jurisdiction is present in this matter.
10. The Court has federal-question subject matter jurisdiction pursuant to 28 U.S.C. §1331 because the suit arises under federal law.
11. The Defendants are residents of different States and the matter in controversy exceeds \$75,000.00 so Diversity jurisdiction is also present in this matter under 28 U.S.C. §1332(a).
12. The United States District for the Eastern District of Washington has personal jurisdiction over the parties and subject matter jurisdiction for the claims in this complaint pursuant to 28 U.S.C. § 1337(a)

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2 **III. FACTS**
3

4 **13. Plaintiff Randall S. Ames was a tenant at the home and farm property located at**
5 **3885 Haverland Meadows Rd., Valley, WA 99181 (hereinafter, "THE FARM").**

6 **14. During the time when Plaintiff Randall S. Ames was a tenant on THE FARM the**
7 **Defendants, acting under color of law in concert with Stevens County Washington**
8 **Law Enforcement officers and Washington State Judges, deprived Plaintiff of equal**
9 **protection under the constitution and statues of the United States of America, and**
10 **violated Plaintiff's due process rights as guaranteed by the 14th amendment of the**
11 **Constitution of the United States of America.**

12 **15. Defendants' wrongful acts under color of law include, without limitation;**

13 **a. Intentionally depriving Defendant of equal protection under the 14th**
14 **Amendment of the Constitution of the United States by depriving Defendant**
15 **of his personal property without due process of law, and denying Defendant**
16 **equal protection of the laws.**

17 **b. Stevens County Deputies, acting under color of law in concert with**
18 **Defendants, and with assistance from Washington State Superior Court**
19 **Judges, trespassed Defendant off of THE FARM while Defendant was a tenant**
20 **on THE FARM.**

21 **c. Stevens County Deputies, acting under color of law in concert with**
22 **Defendants, and with assistance from Washington State Superior Court**
 Judges, by trespassing Defendant of THE FARM unlawfully took Defendant's

1 personal property that was located on THE FARM without due process of
2 law.

3 d. A Washington State Superior Court Judge, acting under color of law in
4 concert with Defendants, denied Defendant equal protection under the
5 RESIDENTIAL LANDLORD-TENANT ACT (RCW 59.18) in issuing a writ of
6 restitution in regard to THE FARM to Stanley Roy Ames and to Wesley Bruce
7 Ames.

8 e. A Washington State Superior Judge, acting under color of law in concert with
9 Defendants, violated Defendants due process rights and denied Defendant
10 equal protection under the laws by ordering Defendant to pay for a
11 Discovery Master and ordering sanctions without giving sufficient notice to
12 Defendant.

13 f. A Washington State Superior Judge, acting under color of law in concert with
14 Defendants, violated Defendants due process rights and denied Defendant
15 equal protection under the laws by making false statements in a Court Order
16 to make it falsely appear that Defendant had failed to fulfill his
17 commitments, and thus lay a false foundation for later sanctions against
18 Defendant.

19 g. Defendants, acting under color of law in concert with Washington State
20 Judges, law enforcement officers, and district attorneys, engaged in unlawful
21 taking of Defendants property, deprived Defendant of justified protective

1 orders, in many matters relating to Defendants' family, personal property,
2 and tenancy in THE FARM.

3 h. Defendants, acting in concert with Washington State Judges, Law
4 Enforcement Officers, and Washington District Attorneys, formed a corrupt
5 enterprise as defined in the Organized Crime Control Act of 1970.

6 i. The corrupt enterprise caused damages to Defendant as described above and
7 as will be shown further at trial.

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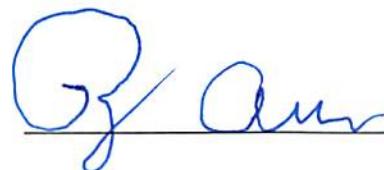
9 IV. PRAYER FOR RELIEF

10 Plaintiff respectfully prays that this Honorable Court enter and Order granting Plaintiff
11 all remedies available by law, including but not limited to an award of:

- 12 1. compensatory damages suffered by Plaintiffs
13 2. costs and reasonable attorneys' fees incurred with this lawsuit with interest
14 thereon;
15 3. all other damages allowed in law or in equity; and
16 4. such other and further relief as the Court deems just or equitable.

17

18 Dated June 14, 2022.



19 Randall S. Ames – Pro Se

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